

**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

April 4, 2008

Allen Masuda, Division Administrator
Federal Highway Administration
Missouri Division
3220 W. Edgewood, Suite H
Jefferson City MO 65109

Re: Section 106 consultation regarding Park Central Square, Springfield, Missouri

Dear Mr. Masuda:

The National Trust for Historic Preservation is concerned about the City of Springfield's plans to redesign Park Central Square in Springfield, Missouri. We understand that the Federal Highway Administration (FHWA) is providing funding through the Missouri Department of Transportation for the Park Central Streetscape project (TCSP-5905(902)) using Transportation and Community and System Preservation funds, and for the Heers Streetscape project (Project STP-5910 (804)), a transportation enhancement project to improve the streetscape around the Heers Building on Park Central Square.

The Park Central Streetscape Project would result in the substantial destruction of Park Central Square, which was designed by renowned landscape architect Lawrence Halprin, and may be eligible for the National Register of Historic Places. Because of the fact that Park Central Square is highly significant, the FHWA must ensure that it has complied with Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the Department of Transportation Act (DOT Act), prior to taking any action to approve this funding.

The National Trust for Historic Preservation would like to participate actively in the review process, as a "consulting party" under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(5) and 800.3(f).

In the meantime, we are very concerned that the City is moving forward with plans that would intentionally significantly harm Park Central Square, prior to the FHWA's compliance with Section 106, in violation of Section 110(k) of the National Historic Preservation Act, 16 U.S.C. § 470h-2(k). We strongly encourage you to communicate with the City in order to ensure that no action is taken to foreclose or unduly restrict alternatives that would avoid and minimize harm to the Square. We also believe that Section 4(f) of the DOT Act is likely to require major changes to the project, in order to respect, rather than destroy, the significant character of the Square, unless it can be demonstrated that there is "no feasible and prudent alternative" to the project as currently proposed.

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The National Trust for Historic Preservation was chartered by Congress in 1949 to promote the historic preservation policy of the United States, and to facilitate public participation in historic preservation (16 U.S.C. § 468). In addition to its headquarters in Washington, D.C., the National Trust has nine regional and field offices, including a Midwest Office in Chicago which is specifically responsive to Missouri preservation concerns. With the strong support of our 250,000 members nationwide, including 4,000 members in Missouri, the National Trust works to protect significant historic sites, to strengthen and revitalize communities, and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The President of the National Trust has also been designated by Congress as a member of the Advisory Council on Historic Preservation, the independent federal agency responsible for assisting other agencies to implement Section 106 of the National Historic Preservation Act (*Id.* § 470i(a)(8)).

The National Trust is extremely concerned about cultural resources of the post-war and modern era, and is working to enhance the public's appreciation for and understanding of these resources. Because of the National Trust's knowledge and concern about historic properties potentially affected by this project, we believe we can provide important information and a valuable national perspective as a consulting party under Section 106.

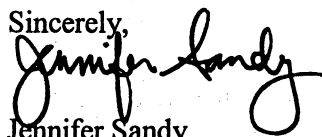
Please include both Jennifer Sandy and Elizabeth Merritt of the National Trust for Historic Preservation in your distribution list for public notices of any meetings, and for the circulation of any documents for comment. All correspondence should be sent to:

Jennifer Sandy
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We look forward to participating as the review and consultation process moves ahead on this project.

Sincerely,



Jennifer Sandy
Program Officer, Midwest Office

cc: Don Klima, Advisory Council on Historic Preservation
Charlene Vaughn, Advisory Council on Historic Preservation
Katty Harris, Advisory Council on Historic Preservation
Mary Ann Naber, Federal Preservation Office, Federal Highway Administration

Allen Masuda, FHWA

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Peggy Casey, Federal Highway Administration

Mark Miles, Director, Missouri State Historic Preservation Office

Dan Chiles, Springfield City Council

Charles Birnbaum, Founder + President, The Cultural Landscape Foundation

Barbara Fitzgerald, Executive Director, Missouri Preservation

Royce Yeater, Midwest Director, National Trust for Historic Preservation

Elizabeth Merritt, Deputy General Counsel, National Trust for Historic Preservation

